

WEIL, GOTSHAL & MANGES LLP
1 Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
2 Theodore E. Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
3 Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
4 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
5 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
6 767 Fifth Avenue
New York, NY 10153-0119
7 Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
9 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
10 Jane Kim (#298192)
(jkim@kbkllp.com)
11 650 California Street, Suite 1900
San Francisco, CA 94108
12 Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Debtors in Possession

CRAVATH, SWAINE & MOORE LLP
Paul H. Zumbro (*pro hac vice*)
(pzumbro@cravath.com)
Kevin J. Orsini (*pro hac vice*)
(korsini@cravath.com)
Omid H. Nasab (*pro hac vice*)
(onasab@cravath.com)
825 Eighth Avenue
New York, NY 10019
Tel: 212 474 1000
Fax: 212 474 3700

Attorneys for Debtors and Debtors in Possession

JONES DAY
Bruce S. Bennett (SBN 105430)
(bbennett@jonesday.com)
Joshua M. Mester (SBN 194783)
(jmester@jonesday.com)
James O. Johnston (SBN 167330)
(jjohnston@jonesday.com)
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071-2300
Tel: 213 489 3939
Fax: 213 243 2539

Attorneys for Shareholder Proponents

15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC**
COMPANY,

22 **Debtors.**

23

24 Affects PG&E Corporation
25 Affects Pacific Gas and Electric Company
 Affects both Debtors

26 * All papers shall be filed in the Lead Case,
27 No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING [PROPOSED]
ORDER APPROVING PLAN FUNDING
TRANSACTIONS AND DOCUMENTS IN
CONNECTION WITH CONFIRMATION
OF DEBTORS' AND SHAREHOLDER
PROPOSERS' JOINT CHAPTER 11
PLAN OF REORGANIZATION**

[Relates to Dkt. Nos. 7521, 7581]

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code with the United States Bankruptcy Court for the Northern District of California (San
Francisco Division) (the “**Bankruptcy Court**”).

4 **PLEASE TAKE FURTHER NOTICE** that, on September 9, 2019, PG&E Corporation and
5 Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in
the above-captioned chapter 11 cases, filed the *Debtors’ Joint Chapter 11 Plan of Reorganization* [Dkt.
6 No. 3841], which was thereafter amended, modified, or supplemented on September 23, 2019 and
November 4, 2019 [Dkt. Nos. 3966 and 4563, respectively].

7 **PLEASE TAKE FURTHER NOTICE** that, on December 12, 2019, the Debtors filed the
8 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated December 12,
9 2019* [Dkt. No. 5101], which was thereafter amended, modified, or supplemented on January 31, 2020,
10 February 7, 2020, March 9, 2020, March 16, 2020, and May 22, 2020 [Dkt. Nos. 5590, 5700, 6217,
11 6320, and 7521, respectively] (and as may be further amended, modified, or supplemented and together
with all exhibits and schedules thereto, the “**Plan**”).

12 **PLEASE TAKE FURTHER NOTICE** that on May 26, 2020, the Debtors filed a proposed form
13 of findings of fact, conclusions of law, and order confirming the Plan [Dkt No. 7581-1] (the “**Original
Proposed Confirmation Order**”).

14 **PLEASE TAKE FURTHER NOTICE** that the hearing to consider confirmation of the Plan
15 commenced on May 27, 2020, and concluded on June 8, 2020.

16 **PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** and **Exhibit B**,
17 respectively, is a proposed form of order approving the funding transactions and documents in
connection with confirmation of the Plan (the “**Proposed Plan Funding Order**”) and a redline
18 comparison of the Proposed Plan Funding Order against the corresponding provisions of the Original
19 Proposed Confirmation Order. The Proposed Plan Funding Order has been reviewed and approved by
counsel to the Official Committee of Unsecured Creditors and the Official Committee of Tort Claimants
and is being concurrently submitted to the Bankruptcy Court for approval.

20 **PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to amend, modify, or
21 supplement the form of Original Proposed Confirmation Order.

22 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
23 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
<http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
24 Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC,
25 at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
that a PACER password is needed to access documents on the Bankruptcy Court’s website.

1 Dated: June 10, 2020
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**WEIL, GOTSHAL & MANGES LLP
CRAVATH, SWAINE & MOORE LLP
KELLER BENVENUTTI KIM LLP**

/s/ *Thomas B. Rupp*

Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153-0119